

A Guide to Privacy Policies^{*}

The goal of this guide is to suggest some sample provisions that may be included in a good privacy policy.¹ While the same principles can be applied to the offline world as well as the online world, this guide is focused mainly on the realm of the Internet. By necessity, the advice and impact of this guide, as well as your privacy policy, will need to be updated as technology changes. Of course, this material is provided solely as a reference and is not intended to be detailed legal advice concerning a specific factual situation.

Before writing a privacy policy for your company or website, you need to look at what your privacy practices actually are. What happens to a person's email address when someone sends you an email message? What behaviors do you track on your website? Do you allow a third party advertiser to place banner ads and send cookies to your website's users? Do you have a third party track your customers' personal information for you? A privacy policy is a promise to the customer and it should reflect the actual relationship of the parties. **IF IT DOES NOT, THEN YOU ARE POTENTIALLY SUBJECT TO LEGAL ACTION UNDER THE MICHIGAN CONSUMER PROTECTION ACT.**² Under that Act, you must truthfully disclose ALL relevant and material information regarding the transaction. Therefore, it is important that you update your privacy policy **BEFORE** you make any changes in your data handling practices and that your policy and actual practices are the same.

As you begin to form a privacy policy, you should keep two concepts in mind. First, tell the customer what you expect the relationship to be. You must disclose what ALL of your data

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¹ This Guide does not discuss the requirements of the Child Online Privacy Protection Act (COPPA) or the requirements of the E.U.-U.S. Safe Harbor Agreement. **THIS GUIDE IS INTENDED MERELY AS A GUIDE. FOLLOWING THIS GUIDE WILL NOT PREVENT YOU FROM BEING SUBJECT TO LEGAL ACTION UNDER ANY OF THE LAWS OF THE STATE OF MICHIGAN.**

² You may still be subject to the Michigan Consumer Protection Act, even if you follow this guide, if your privacy practices violate a consumer's right to privacy in a material manner.

handling practices are. If you intend to collect all kinds of information on users, then conspicuously advise customers of that and request their [affirmative consent](#). If you do not intend to collect any [personally identifiable information](#), then your policy should reflect that as well. Second, keep it simple. If you find that your policy is over four pages in length, you should consider simplifying the policy so that it is easy to read and understand.

Finally, post your policy in a clear and conspicuous location. A link to your privacy policy should, at a minimum, be present on your home page and any other pages that request or require a user to submit information.

Fair Information Privacy Practices

There are several essential elements that should be included in any privacy policy. Basically, a good privacy policy should provide [notice](#) of what information is collected, who collects it, for what purpose the information is collected, and for what use the information is collected. In addition, a good policy should give users a [choice](#) about whether the information is collected and what is done with that information, provide users with [access](#) to any information that is collected, and provide adequate [security](#) for any information that is collected. The latter two categories only apply if information is collected. Finally, the policy should discuss the effect of [changes](#) in the policy and give users adequate [contact information](#).

Notice

The first item that a privacy policy should cover is notice. The notice section of the policy is intended to give users information regarding what information you and others collect about them while they are visiting your site. Additionally, the notice section should tell users why their information is going to be collected and how it is going to be used.

WHO COLLECTS AND WHAT IS COLLECTED?

Obviously, if your website does not collect information about its users, then the privacy policy should state, for example, that:

When visiting this website, no information is collected and stored about you. Any information that you submit to this website is not retained and is used solely to respond to your inquiry.

On the other hand, if you collect basic information about the person's browser type, IP address, and the domain from which the person came without using [cookies](#), for example, then the policy should reflect that:

When visiting this website, information about your browser type, operating system, IP address, and the domain from which you came are collected. Except for what you submit to us, we do not collect any [personally identifiable information](#). Any personally identifiable information that you give us will only be used to respond to you and will not be retained. Any information that we do collect is only used in aggregate to determine whether improvements can be made in our service. The information is not permanently stored.

(and, if using cookies)

Any information that we collect is stored using a [cookie](#) that is placed on your computer. We do NOT use this [cookie](#) to collect or store [personally identifiable information](#) about you. However, the [cookie](#) is used to track information about how you interact with our website. It also allows our website to be customized to meet your interests.

As the number of things you collect increases, you should reflect that in your policy.

Remember that anytime you add a survey or a questionnaire on your site, you have begun collecting more information than your privacy policy discloses. Especially when a third party is conducting the survey, you need to make sure that your users are aware of the third party interaction.

At the far extreme of the spectrum is a website that collects all types of information about the user. Its notice section might read as follows:

When you are visiting this website, we collect all types of information concerning your viewing patterns, browser, operating system and IP address, and any [personally identifiable information](#) that you provide to us, regardless of whether it is required or not. In order to track your viewing patterns and provide you with a customized website, we place a “[cookie](#)” on your computer that allows us to recognize you when you visit our site.

In addition, a third party advertising company may place an additional [cookie](#) on your computer and use it to collect information about you. More information can be found following this link on [cookies](#).

Finally, an affiliated company that we have retained to conduct an online survey regarding your interests is collecting information.

FOR WHAT PURPOSE IS INFORMATION COLLECTED AND HOW IS IT USED

In addition to notifying users about what information is collected, a good privacy policy should also explain how the company uses that information. For example:

When visiting this website, no information is collected and stored about you. Any information that you submit to this website is not retained and is **used solely to respond to your inquiry**.

It is probably best to avoid being too lengthy or technical in your statement of how the information is used. For the intermediate level, you can simply state that the information is used to improve the website and to facilitate the company’s ability to market its product. It is also helpful to mention whether or not your company aggregates the data or keeps it on a time-specific or user-specific basis:

Any information that is collected is only used in aggregate to determine whether improvements can be made in our service. The information is not permanently stored and not used for any other purpose.

(or)

Any information that is collected is stored for 6 months. However, the information is only used internally to enhance the usability of our website.

At the next level, your company may disclose information in aggregate in order to receive funding from advertising agencies:

Any information that we collect is used, in aggregate, with all [personally identifying information](#) removed, to justify the fees that we charge advertisers to advertise on our website. By providing this information, our website is better able to keep our costs down and provide you with better quality service.

If your website collects all types of information and then markets or sells those profiles to other companies or advertisers, then your policy might read:

Any information that we collect may be sold, rented, or leased to third parties that may have an interest in contacting you with special offers that we believe may be of interest to you. By giving us information about yourself, you are agreeing to allow us to disseminate that information to third parties. Those third parties are not restricted in their use of that information except to the extent that we restrict its use. By allowing us to market your personal information in this manner, you allow us to keep the costs associated with our website low and allow us to pass the savings on to you, the consumer. However, in order to pass these savings on to you, we need your permission to allow us to use the information. If you follow this link to our [affirmative consent](#) page, you will allow us to market information about you.

<http://consent.john-doe.com/>

On any page that requires you to submit [personally identifiable information](#), you will find this choice to [affirmatively consent](#) to its further use. You do have the right to revoke your consent at any time. If you revoke your consent, all information that we have regarding you will be erased within one month. This may cause our website to lose its functionality or any special features that we have set up for you. If you wish to revoke your consent, send an email message to privacy@john-doe.com.

In addition, third parties are collecting information about you through the use of [cookies](#) and through information that we provide to them. See the section on [cookies](#) for more information about contacting those third parties.

Finally, we allow other affiliated companies to collect and use information about you. While we require that those companies maintain privacy policies that cover the areas of notice, choice, access and security, any information that you submit to those affiliated companies is governed by their privacy policy. Again, on any page that you are asked to submit [personally identifiable information](#), you will

find a link to that company's privacy policy and the choice to [affirmatively consent](#).

Finally, you need to disclose whether or not information from other sources will be merged with the information that the website collects. For instance, if you contact an advertising agency for more information about a particular person so you can determine whether or not they will be interested in a particular offering.

Choice

As shown in the previous example, when you provide consumers with notice regarding the way in which their information is going to be used, you should also provide them with a meaningful choice regarding the use of their information. In order to provide consumers with a choice, you need to have set up the means for the person to [affirmatively consent](#) to the system and some way to get out once they are there. The prior example contemplates a situation where whenever the website is requesting [personally identifying information](#), there is always a link to the privacy policy and a box that may be checked by the user that either allows your company (or others) to use their information in conformance with the respective privacy policies or not use their information. Because we live in an automated world, it is sometimes difficult for a company to really remove a person from their system very quickly. Hence, a good privacy policy should give persons a good indication of how long it will take to be removed once they decide to revoke their consent.

As part of the process of removing someone from your system, you need to be aware of how your system collects data and uses [cookies](#). In some cases, in order for the system to stop recognizing the person by their cookie, it may be necessary to overwrite your company's cookie with an "opt-out" cookie that will stop your computer system from trying to identify the user

when they visit your site. The placement of an opt-out cookie should only require the user to click on one link. This could even be accomplished by providing a hyperlink in a reply email message when the person revokes their consent. However, an opt-out cookie should be available to users who do not [affirmatively consent](#) to data collection initially.

Finally, you should inform users that you may be required to divulge information in response to a warrant or subpoena or other court order as required by law. Your policy should read:

We sometimes are required by court orders or other laws to divulge information about you to law enforcement authorities, to government agencies or to the court.

Access

For those companies that do collect information, it is a good practice to allow users access to that information and the ability to correct and delete the information. Unfortunately, there is no easy formula for determining how much access should be provided or the method to authenticate users. Hence, your privacy policy statement regarding access should be specifically tailored to your company's practices. Keep in mind that your company should provide to users the maximum amounts of access and security in balance with the nature of the information. For instance, if your website does not collect [personally identifiable information](#), there may be no way that you can reveal the information on a particular person. Hence your policy statement could read:

Since this website does not collect any [personally identifiable information](#) and does not use [cookies](#), we cannot provide access to any information that we collect because we have no way to verify what information is yours.

At the intermediate level, if your website uses [cookies](#), you might request that the user find your company's cookie and give you the associated globally unique identifier. Once they

provide you with that number and their address, then the information can be sent to them.

Another way to provide access would be by allowing users to click on a link that would read the cookie and then display all the information on your server that is associated with that cookie on the user's screen. Hence your policy could read:

This website strives to provide you with the maximum amount of access to the information that we have about you. However, we have no way to identify you without the number that is next to the [cookie](#) that we have placed on your computer. If you would like to receive a copy of the information we have about you, please send a message to privacy@john-doe.com. You will then receive instructions about how to retrieve the [cookie](#) value and receive the information that we have about you.

(or)

This website strives to provide you with the maximum amount of access to the information that we have about you. If you would like to see a copy of the information we have about you, please click on the link below. Our server will then retrieve all the information that we have about you that is connected with the cookie on your computer.

<http://cookieview.john-doe.com/>

Finally, if your website uses user IDs and password protection, then the challenge of providing access to a person's information is merely technical. In this situation, it may be best to generate a webpage that would provide the information that your company maintains about that user. Often, the information is already maintained in this manner, but it may be scattered through several customized pages. Your policy could read:

If you would like access to the information that we have collected about you, then visit this link: <http://privacy.john-doe.com>. You will be required to have your user ID and password in order to access the material.

In addition, you should also provide a mechanism for users to correct and delete information. This might be best accomplished by suggesting that users send an email with corrections or requests to delete information.

If any of this information is found to be in error, please send an email message identifying the error and the correct information to privacy@john-doe.com.

Security

An additional area that should be addressed in your privacy policy is security. Users of the Internet are very concerned about the security of their credit card numbers and “sensitive” personal information. In addition to financial information, “sensitive” information can be thought of as information that you would be embarrassed about if someone else found out about it. For these types of information, it is important your company provides the utmost amount of security. Security should be considered both in releasing the information to third parties (if consented to), releasing the information to the user, and the possibility of hackers breaking into your system. Every company should have worked with their technical staff to ensure that information is maintained securely. Remember that new visitors will only use your website if they believe that you are providing security for the information they are asked to provide. A policy could read:

The security of the information that you provide to us is very important to us. Hence, we have taken several measures to protect your information. All transactions involving sensitive information, such as your credit/debit card number, are conducted using a SSL (Secure Socket Layer protocol) connection. This connection provides increased security to the information as it is transmitted to our website. We will only use your credit/debit card number for the processing of our payment. Other sensitive information that we may collect will not be disclosed to third parties unless we are required to do so by law.

Changing the Policy

One major concern about privacy policies is what happens to the information that has already been collected when the policy is changed or the company is taken over by a company with a different privacy policy. The answer is simple. As previously stated, your privacy policy is like a promise to the user. You cannot simply change the terms of the agreement without asking the other party. If the user does not agree to the changes in the policy, then whatever information you have collected **MUST** be preserved under the prior policy. Hence, when you change your privacy policy, it is best to make the change apply to information that is collected from that point forward. A provision in your privacy policy could read:

We will post any substantive changes in this privacy policy at least 30 days prior to the change taking effect. Any information collected under this current policy will remain bound by the terms of this privacy policy. After the changes take effect, all new information collected, if any, will be subject to the revised privacy policy.

In order for users to receive notice of the proposed changes in the policy, it is a good practice to include a special link to the changes on your homepage, include the changes in a “What’s New” section, email users with a notice of the change in the policy, and provide additional notification on any page that requests or requires users to submit personal information.

Contact Information

Finally, you should give the user a way to contact your company regarding privacy issues. It is generally best to give people as many ways as possible, so a good privacy policy would include an email contact, a postal mail address, and possibly a phone number or fax number.

EXAMPLES

The following examples are provided to put all of the sample provisions together in one form. There are four sample policies:

- (1) Basic Privacy Policy - no information is collected.
- (2) Intermediate Privacy Policy - no personally identifiable information is collected, does not use cookies.
- (3) Intermediate Privacy Policy - no personally identifiable information is collected, does use cookies.
- (4) Detailed Privacy Policy - personally identifiable information is collected.

**WARNING: THE USE OF THESE SAMPLE POLICIES WILL NOT PREVENT YOUR
PRIVACY PRACTICES FROM BEING SUBJECT TO LEGAL ACTION UNDER THE
MICHIGAN CONSUMER PROTECTION ACT.**

Basic Privacy Policy

(No information collected)

Notice

When visiting this website, no information is collected and stored about you. Any information that you submit to this website is not retained and is used solely to respond to your inquiry.

Choice

We will not request any personally identifying information from you in order to use our website.

Access

Since this website does not collect any information, we do not know who you are and there is no information stored by this website for you to access.

Security

Any transmission that you make on the Internet is not secure. However, since we do not collect any information, we have no need for security beyond that necessary to maintain this website.

Changes

We will post any substantial changes in this privacy policy at least 30 days prior to the change taking effect. Any information collected under this current policy will remain bound by the terms of this privacy policy. After the changes take effect, all new information collected, if any, will be subject to the revised privacy policy.

Contact

If you have questions about this policy or feel that we have acted in violation of this policy, please contact privacy@john-doe.com or write:

John-Doe.com, Inc.
123 W. Washington Ave.
John-Doe, MI 12345
(123) 456-7890

Intermediate Privacy Policy

(No personally identifiable information collected, does not use cookies)

Notice

When visiting this website, information about your browser type, operating system, IP address, and the domain from which you came are collected. Except for what you submit to us, we do not collect any [personally identifiable information](#). Any personally identifiable information that you give to us will only be used to respond to you and will not be retained. Information from other sources is not combined with the information that we collect.

(and)

Any information that we collect is aggregated to determine whether improvements can be made in our service. The information is not permanently stored and is not used for any other purpose.

(or)

Any information that we collect is stored for 6 months. However, the information is only used internally to enhance the usability of our website and is not used for any other purpose.

(or)

Any information that we collect is used, in aggregate, with all [personally identifying information](#) removed, to justify the fees that we charge advertisers to advertise on our website. By providing this information, our website is better able to keep our costs down and provide you with better quality service.

Choice

Since we do not collect [personally identifiable information](#), we have no way to know who you are. Hence, while we may use the information that we do collect in any number of ways, we have no way of verifying who you are in order to give you a choice as to its collection.

Access

Since this website does not collect any [personally identifiable information](#), we cannot provide access to any information that we collect because we have no way to verify what information is yours.

Security

Any transmission that you make on the Internet is not secure. However, since we do not collect any [personally identifiable information](#), we only provide the security necessary to maintain our website.

Changes

We will post any substantial changes in this privacy policy at least 30 days prior to the change taking effect. Any information collected under this current policy will remain bound by the terms of this privacy policy. After the changes take effect, all new information collected, if any, will be subject to the revised privacy policy.

Contact

If you have questions about this policy or feel that we have acted in violation of this policy, please contact privacy@john-doe.com or write:

John-Doe.com, Inc.
123 W. Washington Ave.
John-Doe, MI 12345
(123) 456-7890

Personally Identifiable Information

We consider any information that could reasonably be used to identify you personally as personally identifiable information. This includes, but is not limited to:

1. Your name
2. Your address
3. Your email address
4. Your Social Security number
5. Your password
6. Bank account information
7. Credit card information
8. Any combination of data that could be used to identify you such as your birthdate, your zip code and your gender.

Intermediate Privacy Policy

(No personally identifiable information collected, does use cookies)

Notice

When visiting this website, information about your browser type, operating system, IP address, and the domain from which you came are collected. In addition, we also collect information about your browsing behavior at this site. Except for what you submit to us, we do not collect any [personally identifiable information](#). Any personally identifiable information that you give to us will only be used to respond to you and will not be retained.

Any information that we collect is stored using a [cookie](#) that is placed on your computer. We do NOT use this [cookie](#) to collect or store [personally identifiable information](#) about you. However, the [cookie](#) is used to track information about how you interact with our website. It also allows our website to be customized to meet your interests.

Any information that we collect and store using [cookies](#) is solely for internal use and will not be sold, rented, or leased, exchanged, or given to other third parties. We use [cookies](#) in order to make your experience at our web site more personal. Information from other sources is not combined with the information that we collect.

In addition, we also allow several third party advertisers to display advertisements on our website. In connection with this service, these third parties may place a [cookie](#) on your computer. For more information, follow this link for information on [cookies](#).

Choice

This website uses [cookies](#) to be able to identify you when you return to our website. If you do not allow cookies to be placed on your computer, this web site may not function properly. However, you may prevent the placement of a cookie on your computer by setting the Preferences or Internet Options of your browser to reject cookies or you may click on the following link to receive an opt-out cookie that will prevent our system from placing a unique cookie to your computer:

<http://opt-out.privacy.john-doe.com/>

Access

This website strives to provide you with the maximum amount of access to the information that we have about you. However, we have no way to identify you without the number that is next to the [cookie](#) that we have placed on your computer. If you would like to receive a copy of the information we have about you, please send a request to privacy@john-doe.com. You will then receive instructions about how to retrieve the [cookie](#) value and receive the information that we have about you. If you wish to correct or delete information, please send a message to privacy@john-doe.com.

(or)

This website strives to provide you with the maximum amount of access to the information that we have about you. If you would like to see a copy of the information we have about you, please click on the link below. Our server will then retrieve all the information that we have about you that is associated with the cookie on your computer.

<http://cookieview.john-doe.com/>

If you wish to correct or delete information, please send a message to privacy@john-doe.com.

Security

Any transmission that you make on the Internet is not secure. However, since we do not collect any [personally identifiable information](#), we only provide the security necessary to maintain our website.

Changes

We will post any substantial changes in this privacy policy at least 30 days prior to the change taking effect. Any information collected under this current policy will remain bound by the terms of this privacy policy. After the changes take effect, all new information collected, if any, will be subject to the revised privacy policy.

Contact

If you have questions about this policy or feel that we have acted in violation of this policy, please contact privacy@john-doe.com or write:

John-Doe.com, Inc.
123 W. Washington Ave.
John-Doe, MI 12345
(123) 456-7890

Cookies

Cookies are bits of computer code that can be accessed by our computer when you visit our website. Cookies allow us to collect information about you so that your experience on our web site will be as customized as possible. In addition, third party advertisers often use cookies to track information about what ads you have seen and the types of things that you are interested in. Each advertiser has their own privacy practices and you should contact the advertiser's web site regarding their privacy practices and your ability to choose whether information about your browsing habits is collected. You can prevent cookies from being placed on your computer by accessing your browser's Preferences or Internet Tools menu. Third party advertisers which serve this website are:

<http://www.ads-and-fads.com>

Privacy policy: http://www.ads-and-fads.com/privacy_policy/

Affirmative consent option: http://www.ads-and-fads/privacy_policy/privacy.htm

<http://www.oceans-of-ads.com>

Privacy policy: <http://www.oceans-of-ads.com/privacy/privacy.htm>

Personally Identifiable Information

We consider any information that could reasonably be used to identify you personally as personally identifiable information. This includes, but is not limited to:

1. Your name
2. Your address
3. Your email address
4. Your Social Security number
5. Your password
6. Bank account information
7. Credit card information
8. Any combination of data that could be used to identify you such as your birthdate, your zip code and your gender.

Detailed Privacy Policy

(Personally identifiable information is collected)

Notice

When you are visiting this website, we collect all types of information concerning your viewing patterns, your browser, operating system and IP address, and any [personally identifiable information](#) that you provide to us, regardless of whether it is required or not. In order to track your viewing patterns and provide you with a customized website, we place a “[cookie](#)” on your computer that allows us to recognize you when you visit our site.

In addition, a third party advertising company may place an additional [cookie](#) on your computer and use it to collect information about you. More information can be found following this link on [cookies](#).

Finally, an affiliated company that we have retained to conduct an online survey regarding your interests is collecting information. This company’s privacy policy is at:

<http://surveynow.com/privacy>

We use the information that we collect for any purpose that we deem to be in your best interest. Information from other sources is not combined with the information that we collect.

Choice

Any information that we collect may be sold, rented, or leased to third parties that may have an interest in contacting you with special offers that we believe may be of interest to you. By giving us information about yourself, you are agreeing to allow us to disseminate that information to third parties. Those third parties are not restricted in their use of that information except by the authority that we grant to them. By allowing us to market your personal information in this manner, you allow us to keep the costs associated with our website low. However, in order to pass these savings on to you, we need your permission to allow us to use the information. If you follow this link to affirmative consent, you will allow us to market information about you.

<http://consent.john-doe.com/>

On any page that requires you to submit [personally identifiable information](#), you will find this choice to [affirmatively consent](#). You do have the right to revoke your consent at any time. If you revoke your consent, all information that we have regarding you will be erased within one month. This may cause our website to lose its functionality or any special features that we have set up for you. If you wish to revoke your consent, send an email message to privacy@john-doe.com.

In addition, third parties are collecting information about you through the use of [cookies](#) and through information that we provide to them. See the section on [cookies](#) for more information about contacting those third parties.

Finally, we allow other affiliated companies to obtain and use information about you. While we require that those companies maintain privacy policies that cover the areas of notice, choice, access, and security, any information that you submit to those affiliated companies is governed by their privacy policy. Again, on any page that you are asked to submit [personally identifiable information](#), you will find a link to that company's privacy policy and the choice to [affirmatively consent](#). Here is a list of affiliated companies:

<http://affiliates-of.john-doe.com/>

<http://partners-of.john-doe.com/>

Court Proceedings

We sometimes are required by court orders or other laws to divulge information about you to law enforcement authorities, to government agencies or to the court.

Access

If you would like access to the information that we have collected about you, then visit this link: <http://privacy.john-doe.com>. You will be required to have your user ID and password in order to access the material. If you wish to correct or delete information, please send a message to privacy@john-doe.com.

Security

The security of the information that you provide to us is very important to us. Hence, we have taken several measures to protect your information. All transactions involving sensitive information, such as your credit/debit card number, are conducted using a SSL (Secure Socket Layer) connection. This connection provides increased security to the information as it is transmitted to our website. We will only use your credit/debit card number for the processing of our payment. Other sensitive information that we may collect will not be disclosed to third parties unless we are required to do so by law. In the event that our security system is breached, we will attempt to notify you as soon as possible.

Changes

We will post any substantial changes in this privacy policy at least 30 days prior to the change taking effect. Any information collected under this current policy will remain bound by the terms of this privacy policy. After the changes take effect, all new information collected, if any, will be subject to the revised privacy policy.

Contact

If you have questions about this policy or feel that we have acted in violation of this policy, please contact privacy@john-doe.com or write:

John-Doe.com, Inc.
123 W. Washington Ave.
John-Doe, MI 12345
(123) 456-7890

Cookies

Cookies are bits of computer code that can be accessed by our computer when you visit our website. Cookies allow us to collect information about you so that your experience on our website will be as customized as possible. In addition, third party advertisers often use cookies to track information about what ads you have seen and the types of things that you are interested in. Each advertiser has their own privacy practices and you should contact the advertiser's website regarding their privacy practices and your ability to choose whether information about your browsing habits is collected. You can prevent cookies from being placed on your computer by accessing your browser's preferences menu. Third party advertisers which serve this website are:

<http://www.ads-and-fads.com>

Privacy policy: http://www.ads-and-fads.com/privacy_policy/

Affirmative consent option: http://www.ads-and-fads/privacy_policy/privacy.htm

<http://www.oceans-of-ads.com>

Privacy policy: <http://www.oceans-of-ads.com/privacy/privacy.htm>

Affirmative consent

By affirmatively consenting, you are giving us your express consent to use the information that we collect about you for marketing and advertising purposes. This includes the release of this information to third parties. IN NO EVENT WILL WE EVER RELEASE YOUR CREDIT/DEBIT CARD OR PAYMENT INFORMATION, except as necessary to receive payment. This affirmative consent merely allows us to use the other information that we have collected about you.

Personally Identifiable Information

We consider any information that could reasonably be used to identify you personally as personally identifiable information. This includes, but is not limited to:

1. Your name
2. Your address
3. Your email address
4. Your Social Security number
5. Your password
6. Bank account information
7. Credit card information
8. Any combination of data that could be used to identify you such as your birthdate, your zip code and your gender.